

KING & SPALDING

King & Spalding LLP
1700 Pennsylvania Avenue, N W
Washington, DC 20006-4706
www.kslaw.com

Thomas J Spulak
Partner
Direct Dial (202) 661-7948
Direct Fax (202) 626-3737
tspulak@kslaw.com

October 31, 2006

VIA FACSIMILE

Mr. Jeff S. Jordan
Supervisory Attorney
Complaints Examination & Legal Administration
Federal Election Commission
999 E Street, NW
Washington DC 20463

2006 NOV - 6 A 10:23
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Re: MUR 5789

Dear Mr. Jordan:

As indicated in the Statement of Designation of Counsel submitted on August 23, 2006, we are counsel for Robert M. Higdon, Treasurer, and the Bacardi, Inc. PAC ("PAC"), the respondents in MUR 5789 ("Respondents"). We recently received your letter and the amended MUR 5789. We would respectfully request a 20-day extension within which to file a response to the amended complaint. See 11 C.F.R. § 111.6.

We would request a response to this letter at your earliest convenience so that we may plan accordingly.

Respectfully,


Thomas J. Spulak

cc: Frederick J. Wilson III, Esquire
Senior Vice President, General Counsel
and Secretary